

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Z.A., an Infant, by and through his Parents  
and Natural Guardians, CARMIT  
ARCHIBALD and GEORGES  
ARCHIBALD, and CARMIT ARCHIBALD,  
*individually,*

Plaintiffs,

- against -

HYATT CORPORATION,

Defendant.

Docket No. 1:24-cv-03742

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT AS TO  
HYATT CORPORATION**

(Oral Argument Requested)

**PLEASE TAKE NOTICE** that, upon the annexed declarations of Katrina Love, movant's Statement of Material Facts, movant's Memorandum of Law, all exhibits annexed thereto, all prior pleadings had herein, and upon all materials to which this Court may take judicial notice, the undersigned will move this Court, at the United States Courthouse, 500 Pearl Street, Room 21C, New York, New York 10007, on a date to be determined by the Court, for an Order:

- a) Granting summary judgment pursuant to Federal Rule of Civil Procedure 56, dismissing the complaint against Hyatt Corporation on the ground that the Court lacks personal jurisdiction over Hyatt Corporation;
- b) For an Order staying discovery in these proceedings until the within motion for summary judgment is decided; and
- c) Granting movant such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested only if this motion is opposed.

Dated: New York, New York

October 5, 2024

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

By: /s/ *Amneet Mand*

Amneet Mand, Esq.

*Attorney for Defendants*

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New York, New York 10005

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**TO: All parties via ECF**

**CERTIFICATE OF SERVICE**

Amneet Mand, an attorney duly admitted to practice before this Court, certifies that on September 5, 2024, she caused the Notice of Motion, Declarations, Statement of Material Facts, and Memorandum of Law to be filed and served upon the attorneys of record for plaintiff via ECF.

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/s/ Amneet Mand

Amneet Mand